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Coast Guard



SEP 27 1992 Commandant
U.S. Coast Guard

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Searcy:

This letter is in reply to comments filed by Tendler Technologies, Inc. (Tendler), in PR Docket No. 92-164, Amendment of Part 80 of the Commission's Rules Concerning Class C Emergency Position Indicating Radio Beacons (EPIRBs). Note that this proceeding was initiated by our request asking the FCC to eliminate authorization of Class C EPIRBs by February 1, 1999.

Tendler is asking the Commission to reconsider its proposed phaseout of Class C EPIRBs on the grounds that these EPIRBs are one more method of emergency alerting for recreational boaters. There are currently relatively few boaters carrying these EPIRBs and only one or two known manufacturers left because of the extreme lack of demand for these EPIRBs. This creates a problem for us. Since the peculiar alert tone from this EPIRB is heard so infrequently, we are afraid most operators of vessels which guard VHF Channel 16, and even many of our own watchstanders, would not recognize that tone as coming from an EPIRB. This problem is worse when the radio channel is congested.

Recreational boaters have been purchasing the more reliable Satellite EPIRBs for many years and we believe boaters will continue to purchase these EPIRBs instead of the unpopular and ineffective Class C EPIRB which will be obsolete in the near future (we note that the 121.5 MHz Satellite EPIRB will also eventually become obsolete as the 406 MHz Satellite EPIRB gains popularity and becomes more affordable). Satellite EPIRBs and VHF DSC will provide two very reliable means of emergency alerting for these boaters. To speed up the availability of VHF DSC equipment to the maritime community, we recently filed a petition with the FCC (RM-8031) requesting that manufacturers incorporate a DSC function in all marine radios sold after February 1, 1997, or sooner.

Tendler maintains that recreational boaters are unaware of the availability of VHF DSC transceivers. This is true at this time because DSC has not been implemented in the U.S. However, we have under construction a trial-operational VHF DSC facility

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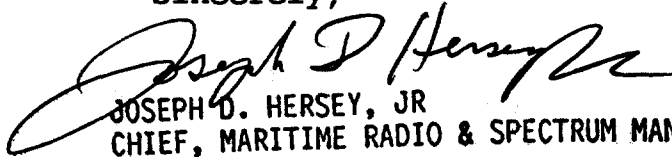
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located at the Coast Guard Group Radio Station in St. Petersburg, Florida. We intend to authorize VHF DSC facilities at additional Coast Guard sites as Government funding becomes available. We expect to have most of our Group Radio Stations equipped with VHF DSC by February 1, 1999. If manufacturers begin incorporating a DSC function in their radios on or before February 1, 1997, we believe that the majority of the boating public will carry VHF DSC radios by 1999.

Tendler argues that dropping the watch requirements on Channel 16 will affect boating safety because the vast majority of recreational boaters will not have VHF DSC equipment on their vessels. As we point out above, we are working with the FCC to make VHF DSC equipment available to the public as soon as possible; however, we take this opportunity to clarify our intentions regarding discontinuance of the aural watch on Channel 16. In our petition, we stated that under the GMDSS the aural watch on Channel 16 will be replaced by an automated watch on Channel 70. In its Notice, the Commission noted instead that we will discontinue the aural watch on Channel 16 in 1999. Tendler is right in objecting to that statement. We do not plan to discontinue the aural watch in 1999. We plan to continue the aural watch through 1999, and discontinue it at a time when we are convinced that a watch on Channel 16 is no longer required. Until the majority of boaters have installed DSC equipment aboard their vessels, we fully intend to provide overlap of the aural and automated watches to ensure safety of life and property. We also note that VHF DSC will provide a more reliable and effective means of emergency alerting than what is currently available on Channel 16. Channel 16 has been plagued by congestion problems for many years making it increasingly difficult for the Coast Guard to receive distress calls. We therefore will be forced to discontinue an aural watch on VHF Channel 16 as soon after 1999 as is practicable.

In summary, we confirm the Commission's conclusion in the Notice that the proposal to eliminate authorizations for Class C EPIRBs will not have a significant impact on the maritime community, and in fact is needed to ensure devices used for distress purposes work as advertised.

Sincerely,



JOSEPH D. HERSEY, JR
CHIEF, MARITIME RADIO & SPECTRUM MANAGEMENT DIVISION
BY DIRECTION

Copy: Mr. George Dillon, FCC Private Radio Bureau
Mr. Robert Tendler, Tendler Technologies, Inc.